

**THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE REEBOK EASYTONE LITIGATION

This Document Relates to: All Actions

Case No. 4:10-CV-11977-FDS

CLASS ACTION

**JOINT MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND
RELATED ORDERS**

Counsel for Plaintiffs, on behalf of a putative nationwide Class, and counsel for Reebok International Ltd. (“Reebok” or “Defendant”), in this action respectfully jointly move this Court for the following relief:¹

1. Finally approving the proposed settlement as fair, reasonable and adequate pursuant to Fed. R. Civ. P. 23;
2. Finally certifying the Class for settlement purposes only;
3. Finding that the Notice was the best practicable notice under the circumstances and satisfied all Constitutional and other requirements;
4. Confirming Class Members who have submitted timely requests for exclusion;
5. Dismissing the Action with prejudice;
6. Retaining jurisdiction over the enforcement and implementation of the Settlement Agreement;
7. Issuing a permanent injunction;
8. Awarding attorneys’ fees and costs and class representative awards; and

¹ All capitalized terms are as defined in the Settlement Agreement.

9. Issuing related orders,
with the Fairness Hearing set for January 17, 2012 at 2:30 P.M., Eastern Time before this
Honorable Court.

Proposed forms of the final order and final judgment are attached hereto as Exhibits A
and B, respectively. Counsel for Plaintiffs and Defendant are separately submitting memoranda
of law in support of this motion.

Pursuant to paragraph 7 of the Preliminary Approval Order, docket number 47, the
parties expressly reserve all rights to “supplement[]” their memoranda of law in support of final
approval “up to seven days prior to the Fairness Hearing.”

WHEREFORE, for the reasons stated herein and as fully discussed in the accompanying
memoranda of law, declarations and/or affidavits, counsel for Plaintiffs, on behalf of a putative
nationwide class, and Reebok respectfully request this Court to grant the relief requested above
in its entirety.

Dated: December 14, 2011

Respectfully submitted

/s/ David Pastor
David Pastor (BBO # 391000)
GILMAN AND PASTOR, LLP
63 Atlantic Avenue, 3rd Floor
Boston, MA 02110
Telephone: 617-742-9700
Facsimile: 617-742-9701
dpastor@gilmanpastor.com

/s/ Russell A. Gaudreau III
John P. Hooper (Admitted *Pro Hac Vice*)
Russell A. Gaudreau III (BBO# 640842)
REED SMITH LLP
599 Lexington Avenue
New York, NY 10022
Tel: (212) 521-5400
Fax: (212) 521-5450
jhooper@reedsmith.com
rgaudreau@reedsmith.com

Lead Counsel

Adam J. Levitt (Admitted *Pro Hac Vice*)
Edmund S. Aronowitz (Admitted *Pro Hac Vice*)
**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLC**
55 West Monroe Street, Suite 1111
Chicago, Illinois 60603
Telephone: 312-984-0000
Facsimile: 312-984-0001
levitt@whafh.com
earonoeitz@whafh.com

Counsel for Plaintiffs

/s/ Dennis J. Kelly
Dennis J. Kelly (BBO #266340)
Shepard Davidson (BBO # 557082)
Andrea L. Martin (BBO # 666117)
BURNS & LEVINSON LLP
125 Summer Street
Boston, MA 02110
Tel: (617) 345-3000
Fax: (617) 345-3299
dkelly@burnslev.com
sdavidson@burnslev.com
amartin@burnslev.com

*Counsel for Defendant Reebok International
Ltd.*

RULE 7.1 CERTIFICATION

The undersigned attorney for Defendant hereby certifies that counsel for Defendant conferred with counsel for Plaintiff regarding the subject of this motion and have attempted in good faith to narrow the issues set forth herein.

/s/ Russell A. Gaudreau III
Russell A. Gaudreau III

CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by first class postage pre-paid U.S. mail to those indicated as non-registered participants on December 14, 2011, which are:

Eveline Schaffer Shekhman
26 Pembroke Hill
Framingham, CT 06032

Jennifer Bishop
29 Hillgate Place
Aliso Viejo, CA 92656

Christina Mitchell
P.O. Box 1391
Glenpool, OK 74033

Michele Selover
617 Myrtle Road
North Brunswick, NJ 08902

Jessica Teigland
3261 N W Orchard Avenue
Corvallis, OR 97330

Elizabeth Flaherty
19 Holman Street
Allston, MA 02134

Martha Bartsch
636 Village Park Dr. # 203
Wilmington, NC 28405

Lynette L Davis
283 Rainbow Cv.
Rainbow City, AL 35906-8637

/s/ Russell A. Gaudreau III
Russell A. Gaudreau III